REMARKS

Claims 1-20 are pending. The Office Action rejects claims 1-3, 10, 14-18, and 20 under 35 U.S.C. §103(a) over Schmitt (U.S. Patent No. 4,788,082) in view of Stickney ("Angular Distribution of Flow..."), rejects claims 4-6, 9, and 11-12 under §103(a) over Schmitt in view of Shah (U.S. Patent No. 6,468,605), rejects claims 7 and 8 under §103(a) over Schmitt in view of Stickney, Shah, and Kirk-Othmer ("Kirk-Othmer Vacuum Technology"), and rejects claims 13 and 19 under §103(a) over Schmitt in view of Stickney, Shah, and Bickford (U.S. Patent No. 5,709,906). These rejections are respectfully traversed.

The Office Action's Interpretation of the Claims is Inaccurate.

Independent claims 1 and 11 recite, in relevant part, forming a patterned film of organic material on a substrate, the patterned film comprising **a plurality of pixels**. The Office Action asserts that forming a patterned film comprising a plurality of pixels is not patentably distinct from the blanket surface coating described by Schmitt because Schmitt's coating "is a pattern and therefore is a patterned film and the pattern film will inherently comprise pixels" and because "the applicant does not define the term pixel, or the scope of what is encompassed by the term pixel." Office Action, p. 4, lines 15-17.

Applicants respectfully disagree with this characterization of the features recited in the claims. "Claims must be 'given their broadest reasonable interpretation **consistent with the specification**.'" M.P.E.P. § 2111 (citing *Phillips v. AWH Corp.*, 415 F.3d 1303, 75 USPQ2d 1321 (Fed. Cir. 2005)) (emphasis added). This broadest reasonable interpretation also must be "consistent with the interpretation that those skilled in the art would reach." M.P.E.P. § 2111. The Office Action does not explicitly indicate the definition or interpretation that is applied with respect to the recited patterned film comprising a plurality of pixels. However, it is respectfully submitted that the analysis presented in the Office Action is inconsistent with both the specification and the interpretation that would be reached by those of skill in the art and, therefore, fails to support a *prima facie* case of obviousness.

The Office Action's Interpretation is Not Consistent with the Specification.

In the context of the present application, a pixel generally refers to the smallest independently-addressable unit of an optoelectronic device, such as a display. For example, the specification specifically describes the use of pixels in several places:

> At 1000 Å/s and using a linear array of nozzles, each having a diameter to match the **pixel width**, a **1000 pixel wide display** can be printed in ~30 minutes.
>
> The image was generated by OVJP of Alq_3 (flow channel diameter a = 20 μm, wall thickness L = 100 μm, nozzle to substrate distance s = 20 ∀ 10 μm, a dwell-time of 2 seconds above **each pixel location**, a movement time **between pixels** of less than 0.2 sec... (¶0036)
>
> At this growth rate, an array of 800 nozzles can print an **SVGA resolution display (600x800 OLED pixels)** in under one minute....To obtain **pixels with flat-top** profiles, the nozzle can be rastered or dithered laterally during growth... (¶0049)

(emphasis added). As illustrated by at least these passages, if the term "pixel" is given its broadest reasonable interpretation **consistent with the specification**, the term cannot encompass the blanket coating of an entire surface used by Schmitt. For example, the phrase "1000 pixel wide display" makes no sense if "pixel" is interpreted to encompass a layer that coats the entire surface of the display substrate. Thus, Applicants respectfully submit that the definition apparently adopted by the Office Action is inconsistent with the specification.

In fact, the layer deposited by Schmitt is not patterned at all. The Office Action asserts that Schmitt's coating is a pattern, but there is no evidence in the cited art to support this conclusion. Patterned films and structures are referenced throughout the present specification:

> Organic vapor jet printing (OVJP) is introduced for the **direct patterning** during growth **of molecular organic semiconductor thin films**.... The non-equilibrium nature of OVJP allows for **high resolution**, nearly 100% efficient, direct printing of **organic semiconductor patterns** and devices.... We demonstrate **pattern resolution** determined in part by the nozzle diameter and separation from the substrate. For example, employing a 20μm diameter orifice, we obtained **patterns of ~25μm in diameter (1000 dots per inch)**....Due to the highly localized and directional characteristic of OVJP, embodiments of the invention allow for the **direct organic film patterning** is possible for substrates of virtually arbitrary size and shape. (¶ 0024)

> To maintain the edge sharpness for **deposited patterns as small as 25 μm** the nozzle-to-substrate separation, *s*, is kept on the order of the molecular mean free path... (¶ 0033)
>
> Although Eq. (6) does not predict the exact deposit shape, it shows the relative influence of process conditions on the **deposited pattern resolution**.... The operating conditions for maximum **pattern resolution** can thus be plotted on a process diagram (Figure 4), where the operating line dictates values of *s* for any given P_L. For example, to maintain high **pattern resolution** even at large separation, *s*, the downstream pressure, P_L, may be decreased. (¶ 0041)

(Emphasis added). The effect of nozzle shape, nozzle-substrate separation, and other factors on pixel and pattern shape is also explained in the specification. *See, e.g.*, ¶ 0041-46.

The Office Action's interpretation of Schmitt's uniform blanket layers as "patterned" is inconsistent with the term's use in the specification. For example, Schmitt's coatings cannot reasonably be described as having a resolution. Therefore, Schmitt does not support an interpretation of blanket coatings as being patterned films as recited in the claims.

For at least each of these reasons, the Office Action's interpretation of the recited patterned film comprising a plurality of pixels is inconsistent with the specification and, therefore, the Office Action fails to support a *prima facie* case of obviousness.

The Office Action's Interpretation is Not Consistent with the Interpretation that would be Reached by One of Skill in the Art.

As illustrated above, the term "pixels" is used throughout the specification. In many cases, the term is used in the context of a display or other optoelectronic device. For example, the passages reproduced above specifically refer to pixels in the context of a display. As would be understood by one of skill in the art, the term "pixel" is often used to describe an independent unit in a display; often a pixel is the smallest addressable unit in such a display. For example, the *McGraw-Hill Dictionary of Scientific and Technical Terms* defines pixel as "the smallest part of an electrically coded picture image" and "the smallest addressable element in an electronic display. " McGraw-Hill Dictionary of Scientific and Technical Terms, Fifth Edition, p. 1516 (1994). Similarly, the ASTM standard definition of pixel is a "picture element." Compilation of ASTM Standard Definitions, Eighth Edition, p. 380 (1994). Copies of these references are attached for the Examiner's convenience. The term also may refer to a set of different color

pixels that is used to create a range of colors from a single "pixel." For example, a single pixel in a full-color display may include a red pixel, a green pixel, and a blue pixel; other combinations are possible.

The use of the term "pixel" in the present specification is consistent with these definitions. Applicants respectfully assert that one of skill in the art would further understand the term to encompass individually-addressable units in other devices, such as photovoltaic cells or other electronic devices fabricated by deposition of thin films. *See, e.g.,* ¶ 0002-03. Based on the specification, one of skill in the art therefore would interpret the term "pixel" to refer to an independently-addressable unit of an electronic device, such as the smallest picture element of a display.

The layers deposited in Schmitt do not have the properties and cannot perform the functions that one of skill in the art would associate with "pixels." There is no suggestion that Schmitt's layers contain regions that are independently addressable or contain individual picture elements. The interpretation of "pixels" suggested by the Office Action, which includes Schmitt's blanket layers, is inconsistent with the interpretation that would be reached by one of skill in the art. For at least this reason, the Office Action fails to support a *prima facie* case of obviousness.

Schmitt Does Not Disclose Deposition of Pixels.

The Office Action asserts that Schmitt's FIGS. 8 and 12 show deposition of individual pixels. *Id.* at p. 4-5. Applicants respectfully disagree. In FIG. 8, Schmitt merely indicates that a coating may be deposited unevenly:

> FIG. (8) shows the flow of the jet 1-7 past a generalized "bluff body" or substrate 9-1 of low or zero curvature. Curvature must be compared to the width of the jet 1-7. The streamlines of the carrier gas jet 1-7 impinge on the surface and then flow along the surface away from the site of impingement termed herein the "stagnation point". The molecules 9-2 of the depositing species are convected by the carrier gas flow to the substrate surface where they condense to form the thin film coating 9-3. The deposit's thickness is exaggerated in this Figure for the purpose of illustration. The deposition is most concentrated at the stagnation point 9-4.

Col. 4, lines 17-28. Schmitt's FIG. 12 merely describes depositing blanket coatings on multiple substrates:

> FIG. (12) shows the use of the apparatus illustrated in FIG. (1) in "batch mode" for the coating of "batches" of substrates. Only the jet 1-7 of FIG. (1) is reproduced in FIG. (12) although the rest of the apparatus of FIG. (1) is assumed to be in place. Substituted for the substrate 1-10 of FIG. (1) is a mechanism 13-1 for holding and transporting individual substrates 13-2 into and through the flow of the jet 1-7 where they recieve [sic] their thin film coating 13-3 as the jet 1-7 transports the condensible species 13-4 to the surface of the individual subtrates [sic] 13-2.

Col. 5, lines 8-18. The Office Action asserts that the thin films 13-3 are pixels. However, each of these films coats an entire substrate. As previously described, an interpretation of the term "pixels" that includes these blanket coatings is incorrect. Schmitt fails to describe deposition of a pixel, much less a patterned film comprising a plurality of pixels as required by the claims.

The Other Cited References Fail to Remedy the Defects of Schmitt.

The other cited references do not remedy the defects of Schmitt identified above. Specifically, Stickney, Shah, Kirk-Othmer, and Bickford fail to describe a patterned organic layer comprising a plurality of pixels. Therefore, whether considered alone or in combination, the cited references fail to render the claims obvious, and all the claims are allowable over the cited art.

Conclusion

Based on the above remarks, Applicants believe the claims are in condition for allowance. The Commissioner is authorized to charge any fees or credit any overpayment to the deposit account of Kenyon & Kenyon LLP, Deposit Account No. 11-0600.

The Examiner is invited to contact the undersigned to discuss any matter concerning this application.

Respectfully submitted,

Date: December 14, 2007

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On the cover: Photomicrograph of crystals of vitamin B_1.
(Dennis Kunkel, University of Hawaii)

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pitticite [MINERAL] A mineral of varying color composed of a hydrous sulfate-arsenate of iron. { 'pid·ə,sīt }

Pittidae [VERT ZOO] The pittas, a homogeneous family of brightly colored suboscine birds with an erectile crown of feathers, in the suborder Tyranni. { 'pid·ə,dē }

pitting [MED] **1.** The formation of pits; in the fingernails, a consequence and sign of psoriasis. **2.** The preservation for a short time of indentations on the skin made by pressing with the finger; seen in pitting edema. [MET] Selective localized formation of rounded cavities in a metal surface due to corrosion or to nonuniform electroplating. [MIN ENG] The act of digging or sinking a pit. { 'pid·iŋ }

pitting edema [MED] Edema of such degree that the skin can be temporarily indented by pressure with the fingers. { 'pid·iŋ ə'dē·mə }

pitting potential [MET] The electrochemical potential in a given environment above which, but not below, a corrosion pit initiates in a metal surface. { 'pid·iŋ pə,ten·chəl }

pi-T transformation *See* Y-delta transformation. { ,pī 'tē ,tranz·fər,mā·shən }

pituicyte [HISTOL] The characteristic cell of the neurohypophysis; these cells are pigmented and fusiform and are probably derived from neuroglial cells. { pə'tü·ə,sīt }

pituitary [ANAT] Of or pertaining to the hypophysis. [PHYSIO] Secreting phlegm or mucus (archaic usage). { pə'tü·ə,ter·ē }

pituitary dwarfism [MED] Stunted growth due to a deficiency of the primary growth hormone; characterized clinically by growth failure in early life, and in older persons by deficient subcutaneous fat with loose, wrinkled skin and precocious senility. { pə'tü·ə,ter·ē 'dwȯr,fiz·əm }

pituitary gland *See* hypophysis. { pə'tü·ə,ter·ē ,gland }

Pityaceae [PALEOBOT] A family of fossil plants in the order Cordaitales known only as petrifactions of branches and wood. { ,pid·ē'ās·ē,ē }

pityriasis [MED] A fine, branny desquamation of the skin. { ,pid·ə'rī·ə·səs }

Pitzer equation [PHYS CHEM] Equation for the approximation of data for heats of vaporization for organic and simple inorganic compounds; derived from temperature and reduced temperature relationships. { 'pit·sər i,kwā·zhən }

pivot [MECH] A short, pointed shaft forming the center and fulcrum on which something turns, balances, or oscillates. { 'piv·ət }

pivotal condensation [MATH] A method of evaluating a determinant that is convenient for determinants of large order, especially when digital computers are used, involving a repeated process in which a determinant of order n is reduced to the product of one of its elements raised to a power and a determinant of order $n - 1$. { ,piv·əd·əl ,kän·dən'sā·shən }

pivotal method [STAT] A technique for passing from one set of double inequalities to another in order to find a confidence interval for a parameter. { ,piv·əd·əl ,meth·əd }

pivotal fault *See* rotary fault. { 'piv·əd·əl 'fôlt }

pivot anchor [DES ENG] An anchor that permits a pipe to swivel around a fixed point. { 'piv·ət ,aŋ·kər }

pivot bridge [CIV ENG] A bridge in which a span can open by pivoting about a vertical axis. { 'piv·ət 'brij }

pivot-bucket conveyor-elevator [MECH ENG] A bucket conveyor having overlapping pivoted buckets on long-pitch roller chains; buckets are always level except when tripped to discharge materials. { 'piv·ət ,bək·ət kən,vā·ər 'el·ə,vād·ər }

pivoted window [BUILD] A window having a section which is pivoted near the center so that the top of the section swings in and the bottom swings out. { 'piv·əd·əd 'win·dō }

pivoting [MATH] In the solution of a system of linear equations by elimination, a method of choosing a suitable equation to eliminate at each step so that certain difficulties are avoided. { 'piv·əd·iŋ }

pivoting point [NAV ARCH] The point about which a ship pivots when turning, usually somewhat forward of amidships. { 'piv·əd·iŋ ,pȯint }

pivot joint [ANAT] A diarthrosis that permits a rotation of one bone around another; an example is the articulation of the atlas with the axis. Also known as trochoid. { 'piv·ət ,jȯint }

PIXE *See* proton-induced x-ray emission. { 'pik·sē }

pixel [COMPUT SCI] The smallest part of an electronically coded picture image. [ELECTR] The smallest addressable element in an electronic display; a short form for picture element. Also known as pel. { pik'sel }

pk *See* peck.

pK [CHEM] The logarithm (to base 10) of the reciprocal of the equilibrium constant for a specified reaction under specified conditions.

PK *See* psychokinesis.

PKA *See* primary knocked-on atom. { ,pē,kā'ā }

PKU *See* phenylketonuria.

Pl *See* poiseuille.

PL/1 [COMPUT SCI] A multipurpose programming language, developed by IBM for the Model 360 systems, which can be used for both commercial and scientific applications. { ,pē,el'wən }

PLA *See* programmed logic array.

placanticline [GEOL] A gentle, anticlinallike uplift of the continental platform, usually asymmetric and without a typical outline. { plak'ant·i,klīn }

place [MATH] A position corresponding to a given power of the base in positional notation. Also known as column. { plās }

placebo [MED] A preparation, devoid of pharmacologic effect, given to patients for psychologic effect, or as a control in evaluating a medicinal believed to have a pharmacologic action. { plə'chā·bō *or* plə'sē·bō }

placeholder [COMPUT SCI] A section of computer storage reserved for information that will be provided later. { 'plās,hōl·dər }

placenta [BOT] A plant surface bearing a sporangium. [EMBRYO] A vascular organ that unites the fetus to the wall of the uterus in all mammals except marsupials and monotremes. { plə'sent·ə }

placenta accreta [MED] A placenta that has partially grown into the myometrium of the uterus. { plə'sent·ə ə'krēd·ə }

placental barrier [EMBRYO] The tissues intervening between the maternal and the fetal blood of the placenta, which prevent or hinder certain substances or organisms from passing from mother to fetus. { plə'sent·əl 'bar·ē·ər }

placentation [BOT] The attachment of ovules along the inner ovarian wall by means of the placenta. [EMBRYO] The formation and fusion of the placenta to the uterine wall. { plas·ən'tā·shən }

placer [GEOL] A mineral deposit at or near the surface of the earth, formed by mechanical concentration of mineral particles from weathered debris. Also known as ore of sedimentation. { 'plās·ər }

placer claim [MIN ENG] A mining claim located upon gravel or ground whose mineral contents are extracted by the use of water, as by sluicing, or hydraulicking. { 'plās·ər ,klām }

placer dredge [MIN ENG] A dredge for mining metals from placer deposits; it consists of a chain of closely connected buckets passing over an idler tumbler and an upper or driving tumbler, mounted on a structural-steel ladder which carries a series of rollers. { 'plās·ər ,drej }

placer location [MIN ENG] Location of a tract of land for the sake of loose mineral-bearing or other valuable deposits on or near its surface, rather than within lodes or veins in rock in place. { 'plās·ər lō,kā·shən }

placer mining [MIN ENG] **1.** The extraction and concentration of heavy metals from placers. **2.** Mining of gold by washing the sand, gravel, or talus. { 'plās·ər ,mīn·iŋ }

place value [MATH] The value given to a digit by virtue of its location in a numeral. { 'plās ,val·yü }

placic horizon [GEOL] A black to dark red soil horizon that is usually cemented with iron and is not very permeable. { 'plā·sik hə'rīz·ən }

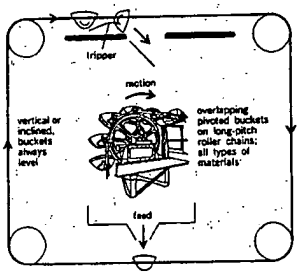
placode [EMBRYO] A platelike epithelial thickening, frequently marking, in the embryo, the anlage of an organ or part. { 'pla,kōd }

Placoderm [PALEON] A large and varied class of Paleozoic fishes characterized by a complex bony armor covering the head and the front portion of the trunk. { ,pla·kə'dər·mē }

Placodontia [PALEON] A small order of Triassic marine reptiles of the subclass Euryapsida characterized by flat-crowned teeth in both the upper and lower jaws and on the palate. { ,plā·kə'dän·chə }

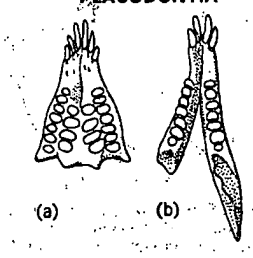
Placothuriidae [INV ZOO] A family of holothurian echinoderms in the order Dendrochirotida; individuals are invested in

PIVOT-BUCKET CONVEYOR-ELEVATOR



Components of pivot-bucket conveyor-elevator and typical path of travel.

PLACODONTIA



Dentition of *Paraplacodus broilii*, Triassic, Switzerland. *(a)* Upper jaw. *(b)* Lower jaw.

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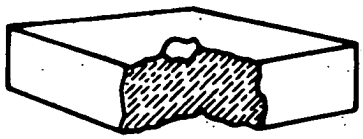
pit—a defect similar to a dimple but slightly smaller. C 286, B–8

pit—an excavation in the surface of the earth from which ore is obtained as in large open pit mining or as an excavation made for test purposes, that is, a testpit. (ISRM) D 653, D–18

pit, *n*—an imperfection, a small crater in the surface of the plastic, with its width of approximately the same order of magnitude as its depth. D 883, D–20

pit—a shallow depression or crater in which all surfaces are visible by normal (20/20) vision under 200 fc of illumination.



F 109, C–21

pit, *n*—small crater in the surface of the plastic, with its width approximately the same order of magnitude as its depth. F 412, F–17

pit—tiny depression or hole on the grain surface of leather, due to natural causes or manufacturing. D 1517, D–31

pit—*on a semiconductor wafer,* a depression in the surface where the sloped sides of the depression meet the wafer surface in a distinguishable manner in contrast to the sides of a dimple that are rounded. F 1241, F–1

pit, *n*—*in plastics,* an imperfection, a small crater in the surface, the depth and width of which are approximately the same order of magnitude. F 1251, F–4

pitch—a term applied to the resin occurring in the wood of certain conifers. D 9, D–7

pitch—the distance from center point to center point of adjacent crests of an asbestos-cement product of corrugated or grooved cross-section. C 460, C–17

pitch:

Archangel pitch—originally a genuine pine pitch made from pine tar in the Archangel district of Russia; in this country a similar product is made from residues of pine origin blended with various oils to make a pitch for caulking boats.

Brewer's pitch—a term used to designate a type of pitch made by blending certain oils, waxes or other ingredients with rosin for the coating of beer barrels.

Burgundy pitch—originally the solidified resin obtained by heating and straining the air-dried solid oleoresin exuded by the Norway spruce (*Picea excelsa*) and European silver fir (*Abies pectinata*); now denotes an artificial mixture made by heating rosin with certain fixed oils, the combination being used for adhesive plasters.

Navy pitch—a pitch obtained by melting rosin with pine tar, with or without rosin distillation residues. D 804, D–1

pitch—the distance between one character reference point and the corresponding point on the next adjacent character. F 149, F–5

pitch, *n*—*in cooling tower fill,* the wave length of corrugated products. C 460, C–17

pitch—See **incline; coal-tar pitch;** or **petroleum pitch.** D 1079, D–8

pitch, *n*—*for woven pile floor covering,* the number of binding sites in 27 in. (686 mm) of width. D 123, D–13

pitch, *n*—an inclination or slope measured in degrees, or percent, or by the ratio of rise and run. E 631, E–6

pitch, *n*—*in asbestos-cement,* the distance from center point to center point of adjacent crests of an asbestos-cement product of corrugated or grooved cross-section. C 1154, C–17

pitch, *n*—*in cooling tower fill,* the wave length of corrugated products. C 1154, C–17

pitch angle, (rad or degree), *n*—*in a vehicle,* the angle between its *X*-axis and the ground plane. F 538, F–9

pitch-bonded basic brick—unburned basic refractory shapes bonded with pitch; if subsequently heat-treated sufficiently to minimize softening of the bond on reheating, they are referred to as *tempered.* C 71, C–8

pitch diameter—for all practical purposes, the diameter of the smooth shank prior to threading. F 547, F–16

pitches—black or dark-brown solid cementitious materials which gradually liquefy when heated and which are obtained as residua in the partial evaporation or fractional distillation of tar. D 8, D–4

pitch-impregnated basic brick—burned basic refractory shapes impregnated with pitch after firing. C 71, C–8

pitch line—line parallel to nail axis located at distance equal to one-half of pitch diameter from nail axis. F 547, F–16

pitch pocket—an opening extending parallel to the annual growth rings containing, or that has contained, pitch, either solid or liquid. D 9, D–7

pitch pocket—a flanged, open-bottomed metal container placed around a column or other roof-penetration, and filled with hot bitumen or flashing cement to seal the joint. D 1079, D–8

pitch polishing—polishing operation in which pitch rather than felt is the resilient carrier for the polishing agent. C 162, C–4

pitch seam—a shake or check filled with pitch. D 9, D–7

pitch streak—a well-defined accumulation of pitch in a more or less regular streak in the wood of certain conifers. D 9, D–7

pith—the small, soft tissue occurring in the structural center of a tree trunk, branch, twig, or log. D 9, D–7

pith fleck—a narrow streak, resembling pith on the surface of a piece; usually brownish, up to several inches in length, resulting from burrowing of larvae in the growing tissues of the tree. D 9, D–7

pits—small depressions, voids or pinholes in stone, especially on a finished surface. C 119, C–18

pitting—corrosion of a metal surface, confined to a point or small area, that takes the form of cavities. G 15, G–1

pitting, *n*—*in tribology,* a form of wear characterized by the presence of surface cavities the formation of which is attributed to processes such as fatigue, local adhesion, or cavitation. G 40, G–2

pitting, *n*—small defects on the surface of the photoreceptor that print out as spots on the print/copy. F 1457, F–5

pitting factor—ratio of the depth of the deepest pit resulting from corrosion divided by the average penetration calculated from weight loss. G 15, G–1

Pittsburgh sheet process—the method of making sheet glass by drawing vertically upward from a free bath surface wherein definition of draw is established by a submerged refractory member. C 162, C–4

pixel—picture element. F 1457, F–5

pixels—picture elements, or cells. F 1156, F–1

placement, *n*—the process of placing and consolidating concrete; a quantity of concrete placed and finished during